

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

UNITED STATES OF AMERICA

3:19-cr-00458-MO

v.

SUPERSEDING INDICTMENT

**JOHNL JACKSON, aka Nelly, and
DIANA PETROVIC,**

Defendants.

**18 U.S.C. § 924(c)(1)(A)(i)
18 U.S.C. §§ 1591(a)(1) and (b)(1)
18 U.S.C. §§ 1591(a)(2) and (b)(2)
18 U.S.C. § 1594(c)
18 U.S.C. §§ 2423(a) and (e)**

Forfeiture Allegations

THE GRAND JURY CHARGES:

**COUNT 1
(Conspiracy to Engage in Sex Trafficking of Children)
(18 U.S.C. § 1594(c))**

Beginning as early as on or about August 1, 2018, and continuing through September 30, 2018, in the District of Oregon and elsewhere, defendants **JOHNL JACKSON** and **DIANA PETROVIC**, knowingly and intentionally combined, conspired, confederated and agreed with each other and with others known and unknown to the Grand Jury, to, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain, by any means a person, and did benefit financially and by receiving anything of value from participating

in a venture engaged in such acts, knowing and in reckless disregard of the fact that such person had not attained the age of 18 years and would be caused to engage in a commercial sex act in violation of Title 18, United States Code, Sections 1591(a)(1);

In violation of Title 18, United States Code, Section 1594(c).

COUNT 2
(Sex Trafficking of a Child)
(18 U.S.C. §§ 1591(a)(2) and (b)(2))

Beginning as early as on or about August 1, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, benefit financially, by receiving anything of value, from participating in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining, by any means, a person, namely Minor Victim 4, and did such acts knowing and in reckless disregard of the fact that Minor Victim 4 had not attained 18 years of age and that Minor Victim 4 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(2) and (b)(2)).

COUNT 3
(Sex Trafficking of a Child)
(18 U.S.C. §§ 1591(a)(2) and (b)(2))

Beginning as early as on or about August 1, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, benefit financially, by receiving anything of value, from participating in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining, by any means, a person, namely Minor Victim 5, and did such acts knowing and in

reckless disregard of the fact that Minor Victim 5 had not attained 18 years of age and that Minor Victim 5 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections §§ 1591(a)(2) and (b)(2))

COUNT 4
(Sex Trafficking of a Child by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

Beginning as early as on or about August 1, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means, a person, namely Minor Victim 5, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 5 to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections §§ 1591(a)(1) and (b)(1).

COUNT 5
(Transportation of a Minor with Intent to Engage in Sexual Activity)
(18 U.S.C. §§ 2423(a) and (e))

Beginning as early as on or about September 3, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, namely Minor Victim 4, in interstate commerce from the State of Oregon to the State of Washington, while having the intent that Minor Victim 4 engage in prostitution, in violation of Oregon Revised Statute §167.007;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

COUNT 6
(Transportation of a Minor with Intent to Engage in Sexual Activity)
(18 U.S.C. §§ 2423(a) and (e))

Beginning as early as on or about September 3, 2018, and continuing through on or about September 6, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, namely Minor Victim 5, in interstate commerce from the State of Oregon to the State of Washington, while having the intent that Minor Victim 5 engage in prostitution, in violation of Oregon Revised Statute §167.007;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

COUNT 7
(Sex Trafficking of a Child)
(18 U.S.C. §§ 1591(a)(2) and (b)(2))

Beginning as early as on or about September 6, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHNL JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, benefit financially, by receiving anything of value, from participating in a venture which engaged in recruiting, enticing, harboring, transporting, providing, obtaining and maintaining, by any means, a person, namely Minor Victim 5, and did such acts knowing and in reckless disregard of the fact that Minor Victim 5 had not attained 18 years of age and that Minor Victim 5 would be caused to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(2) and (b)(2).

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COUNT 8
(Sex Trafficking of a Child by Force, Fraud and Coercion)
(18 U.S.C. §§ 1591(a)(1) and (b)(1))

Beginning as early as on or about September 6, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means, a person, namely Minor Victim 5, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Minor Victim 5 to engage in a commercial sex act;

In violation of Title 18, United States Code, Sections 1591(a)(1) and (b)(1).

COUNT 9
(Transportation of a Minor with Intent to Engage in Sexual Activity)
(18 U.S.C. §§ 2423(a) and (e))

Beginning as early as on or about September 6, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON** and **DIANA PETROVIC**, defendants herein, knowingly transported, and caused to be transported, a person who had not attained 18 years of age, namely Minor Victim 5, in interstate commerce from the State of Washington to the State of Oregon, while having the intent that Minor Victim 5 engage in prostitution, in violation of Oregon Revised Statute §167.007;

In violation of Title 18, United States Code, Sections 2423(a) and (e).

COUNT 10
(Possession of a Firearm in Furtherance of a Crime of Violence)
(18 U.S.C. § 924(c)(1)(A)(i))

Beginning as early as on or about August 1, 2018, and continuing through on or about September 10, 2018, in the District of Oregon and elsewhere, **JOHN L JACKSON**, defendant

herein, knowingly possessed a firearm, to wit: a handgun, in furtherance of a crime of violence which may be prosecuted in a court in the United States, that is: Sex Trafficking of Children in violation of 18 U.S.C. §§ 1591(a)(2) and (b)(2), as alleged in Counts 2, 3 and 7; Sex Trafficking of Children by Force, Fraud and Coercion in violation of 18 U.S.C. §§ 1591(a)(1) and (b)(1), as alleged in Counts 4 and 8; and Conspiracy to Engage in Sex Trafficking of Children in violation of 18 U.S.C. § 1594(c), as alleged in Count 1;

In violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

FIRST FORFEITURE ALLEGATION

Upon conviction of the offenses set forth in Counts 1, 2, 3, 4, 7 and 8, **JOHN JACKSON** and **DIANA PETROVIC**, defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 1594(d) and (e), any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violation.

SECOND FORFEITURE ALLEGATION

Upon conviction of the offenses set forth in Counts 5, 6 and 9, **JOHN JACKSON** and **DIANA PETROVIC**, defendants herein, shall forfeit to the United States pursuant to Title 18, United States Code, Section 2428, any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of such violations, and any property, real or personal, constituting or derived from any proceeds obtained, directly or indirectly, as a result of such violations.

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THIRD FORFEITURE ALLEGATION

Upon conviction of the offense in Count 9, **JOHN L JACKSON**, defendant herein, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), the firearm involved in that offense.

Dated: December 4, 2019

A TRUE BILL.



OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney



JENNIFER J. MARTIN
THOMAS S. RATCLIFFE
Assistant United States Attorneys
GLEN H. UJIFUSA, JR.
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